

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re: : BANKRUPTCY NO. 25-10027-CMB  
:  
KARL WILLIAM KROUSE AND :  
BETTY CORINNE KROUSE, : HON. CARLOTA M. BÖHM  
Debtors :  
:  
M & T BANK, : CHAPTER 13  
Movant, :  
:  
v. : RELATED TO CLAIM #2  
:  
KARL WILLIAM KROUSE AND BETTY CORINNE :  
KROUSE; and RONDA J. WINNECOUR, :  
CHAPTER 13 TRUSTEE, :  
Respondents. :

DECLARATION REGARDING POST-PETITION MORTGAGE FEES, EXPENSES AND CHARGES

I hereby certify as counsel for the Debtors that the existing Chapter 13 Plan is adequately funded and that there is no need to file an amended Chapter 13 Plan.

Respectfully submitted,

THE QUINN LAW FIRM

BY: /s/ Michael S. Jan Janin  
Michael S. Jan Janin, Esquire  
PA Id. No. 38880  
2222 West Grandview Boulevard  
Erie, PA 16506-4508  
Telephone: 814-833-2222, Extension 1045  
Facsimile: 814-833-6753  
[mjanjanin@quinnfirm.com](mailto:mjanjanin@quinnfirm.com)  
Counsel for Debtors

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CHAPTER 13 TRUSTEE, :  
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**CERTIFICATE OF SERVICE OF DECLARATION REGARDING  
NOTICE OF MORTGAGE PAYMENT CHANGE**

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on March 3, 2025.

The types of service made on the parties was sent via CM/ECF Notification System (NO PAPER COPY) to:

- Office of the United States Trustee at [ustpregion03.pi.ecf@usdoj.gov](mailto:ustpregion03.pi.ecf@usdoj.gov)
- Ronda J. Winnecour at [cmevf@chapter13trusteewdpa.com](mailto:cmevf@chapter13trusteewdpa.com)
- Brent J. Lemon on behalf of Creditor M&T BANK at [blemon@kmllawgroup.com](mailto:blemon@kmllawgroup.com)

EXECUTED ON: March 3, 2025

Respectfully submitted,  
THE QUINN LAW FIRM

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[mjanjanin@quinnfirm.com](mailto:mjanjanin@quinnfirm.com)  
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